

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

SCANNED AT PINKNEYVILLE CO and E-mailed  
8-2-16 by JOK 50 pages  
date initials No.

Demetrius D. Moore #509786  
ID#509786

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

-against-

Charles Harley Stegmeyer et al  
Marianne Hannigan  
Stegmeyer & Stegmeyer LTD

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

Complaint for a Civil Case

Case No. 16-870-SMY-SCW  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

IN HIS OR HER Individual Capacity

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**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Demetrius D. Moore #509786
Street Address	P.O. Box 999
City and County	Pinckneyville
State and Zip Code	Illinois, 62274
Telephone Number	
E-mail Address	M. dee21@myemail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	Charles Harley Stegmeyer, Jr.
Job or Title (if known)	Illinois Licensed Attorney
Street Address	7707 West main street Suite #4
City and County	Belleveille, <del>MO</del>
State and Zip Code	Illinois 62223
Telephone Number	618-398-4895
E-mail Address (if known)	Stegmeyerlaw@hotmail.com

**Defendant No. 2**

Name	Marianne Hannigan
Job or Title (if known)	Illinois License Attorney
Street Address	23 public square suite 402
City and County	Belleveille

State and Zip Code Illinois 62223  
 Telephone Number 618-398-4895  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

Defendant No. 3

Name Stegmeyer & Stegmeyer  
 Job or Title Law Firm  
 (if known) \_\_\_\_\_  
 Street Address 7707 W. Main Street Suite #4  
 City and County Belleville  
 State and Zip Code Illinois, 62223  
 Telephone Number 618-398-4895  
 E-mail Address stegmeyerlaw@hotmail.com  
 (if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

I was ~~not~~ not represented by the  
Attorney I paid. due to him being suspended  
from the practice of law. he never notify  
me of his temporary suspension.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

**1. The Plaintiff(s)**

**a. If the plaintiff is an individual**

The plaintiff, (name) ~~Demetrius Moore~~, is a citizen of  
 the State of (name) ~~Illinois~~.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
 under the laws of the State of (name) \_\_\_\_\_,  
 and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)**

**a. If the defendant is an individual**

The defendant, (name) ~~Charles H. Stegmeyer~~, is a citizen of  
 the State of (name) ~~Illinois~~. Or is a citizen of  
 (foreign nation) \_\_\_\_\_.



b. If the defendant is a corporation

The defendant, (name) Charles H. Stegmeyer is incorporated under the laws of the State of (name) Illinois, and has its principal place of business in the State of (name) Illinois. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed. I paid Attorney Charles H. Stegmeyer ON JULY 8, 2014 to respectfully represent me ON 5 Felony cases in Madison County, IL. we had a sit down for 5 mins to discuss fees and we both came to a agreement I sign power of Attorney so Mr. Stegmeyer could use my debit card with direct express to make withdrawals and receive my social security benefits to pay the fees he wanted. He and I agreed on one flat rate of \$7,500.00 total, but Mr. Stegmeyer agreed to take a down payment of \$2,455.00 which was the only (5) amount of fees I had in my account at that time.

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Full Statement of Claim  
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# STATEMENT OF CLAIM

Submit, and if as possible, when, why, how, and by whom you feel your case should be reviewed. Do not include arguments of memoranda, or other documents, or citations, or references. Attach only a plain copy of the charges and any supporting information. Do not attach any relevant, supporting, or identifying information.

On July 7, 2014 I hired Horney Charles, H. Stegmeyer to respectfully represent me on 5 Felony cases in Madison County, IL. we had a sit down talk about fees, and we both came to a understanding agreement I sign power of attorney so Mr. Stegmeyer could use my debit card with Direct Express to make withdrawls and recieve my social security benefits to pay the fees he wanted. he said he wanted the \$2,455.00 in my account as a down payment. and \$491.00 a month from my social security benefits so I ordered a new debit card from Direct Express, and put the debit card in Mr. Stegmeyer care on Direct Express records, and had the debit card sent to his Law Firm by Fedex. Mr. Stegmeyer recieved the debit card and recieved his payments on time every month on the 3<sup>rd</sup> of the month he said him and the states Attorney office had a deal worked out to give me time serve from Jail time. but Mr. Stegmeyer word on the deal with the states Attorney office was untrue. States attorney John. T. Fischer wanted 6 years at 85% the hold time. Mr. Stegmeyer blackmail me into believing if I got him more clients the more it looked good on me in court. I got Mr. Stegmeyer over 10 clients believing if I got him more clients he would get the courts know and I would then get my time serve deal. but on December 4<sup>th</sup>, 2014 Mr. Stegmeyer was suspended from the practice of Law for 60 days. Mr. Stegmeyer or his firm never notify me he was suspended for 60 days which violated Attorneys rule 27. On December 10<sup>th</sup>, 2014 I was called for a attorney visit at the Madison County Jail. a lady by the name of Marianne Hannigan stated she was assisting Mr. Stegmeyer that he was sick in the hospital. I knew Ms. Hannigan was lying because I saw in the Belleville news paper he was suspended. Ms. Hannigan also stated she had my debit card and tried

Continued  $\rightarrow$  next page  $\rightarrow$



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Mrs. Hannigan told me she got my debit card. Mrs. Hannigan stated Mr. Stegmeyer gave it to her. She ask me to Call DirectExpress Customer service dept at 1-888-741-1115 she had the number wrote down on her legal pad. Mrs. Hannigan was not author. by me to have my debit card or use it. She obtained my card and money by deception. That's Fraud and deception. She used my debit card without my consent. That was never apart of Me and Mr. Stegmeyer deal. She assisted Mr. Stegmeyer on a common scheme to engage in the unlawful activity with my debit card in violation of section 17-10.5 (a)(1) of Act 5 of Chapter- 720 ILCS 5/17-10.5 (a)(1) on December 10, 2014 in that said defendant Marianne Hannigan knowingly obtained by deception, control over the property of plaintiff Demetrius D. Moore being \$1,491.00, US Currency, said property having a value in excess of \$500.00, and with the intent to permanently deprive me of the use or benefit of said property in violation of 720 ILCS 5/16-1(a)(i) and against the peace and dignity of the said plaintiff. On February 4, 2015 I called Mr. Stegmeyer Law office and talked with him personally. he stated Mrs. Hannigan was going to Court with me February 5, 2015 to work a deal out with the States Attorney John Fischer, and that ~~the~~ Mrs. Hannigan was a new face to him and maybe get me a good plea deal. On February 5, 2015 I went to court with Mrs. Hannigan and was still offered 6 years at 85%. Mrs. Hannigan Made many attemp to get me to plea on a case I was innocence on. She said Mr. Stegmeyer told her to talk me into taking the 6 years at 85%. Mrs. Hannigan started crying saying Demetrius take the deal please you still will be young when you get out of prison, and if I went to trial the jury would use the Ferguson Michael Brown JR Matter to find me guilty. because it looks bad on my race from whats going on in Ferguson don't (go to) trial Just plea guilty. I ask Mrs. Hannigan what my case got to do with Ferguson unrest. She said the states attorneys and jury don't like whats going on in Ferguson. I didn't take the deal Mrs. Hannigan said Mr. Stegmeyer don't want to represent me any more because of My charges. and I need to find a new attorney because her and Mr. Stegmeyer is filing a motion to withdraw from my case. I went back to the Jail and called Mr. Stegmeyer and

Demetrius I am withdrawing from your case because the states Attorney office want give a good deal on the Jail house assault. he told me it should receive a copy of the motion he file to withdraw from my case. on April 6, 2015 Mr. Stegmeyer and Ms. Hannigan was remove from my case by Judge Neil Schroeder. Mr. Stegmeyer refund me my \$500.00 payment back from the month of March 3<sup>rd</sup>, 2015. on September 14, 2015 I wrote the Attorney registration and disciplinary Commission. because Mr. Stegmeyer charge me \$275.00 per hour which was not apart of any agreement we made. The ARDC wrote back saying they ~~not~~<sup>do</sup> not necessarily agree that he earned the complete amount of fees paid. especially relating to the steps he took to withdraw from my case. on October 20<sup>th</sup>, 2015 I called Mr. Stegmeyer and asked him to refund back all my money back. he agreed to come talk to me. when he came he ask me to stop writing the ARDC and he will do his job on my case. Mr. Stegmeyer got back on my case again so I didn't write ARDC again because I gave him one more time to fix the matter. when the ARDC close the investigation Mr. Stegmeyer ask for \$4,000.00 more. he used me to ~~quit~~ stop the ARDC investigation and when ~~was~~ it was over he ask for more money. I wrote my Judge asking him to not put Mr. Stegmeyer back on my case. Mr. Stegmeyer again withdraw from my case leaving me with out Attorney Funds. I had to get a ~~new~~ public defender because Mr. Stegmeyer took my life savings. he did no work in my case or never ~~even~~ discuss my case with me or let me see my motion of discovery. he took my money and misrepresented me. ~~here and there~~. Mr. Stegmeyer and Ms. Hannigan violated My rights. I lost my 4 kids do to his actions they mother abandon them because she was not able to take care them on her on. I was the only



5. of. 5

Ms. Hannigan was remove from the Madison County Jail by officer Tim Walker for seeing clients as well as my self that was not her or Mr. Stegmeyer clients. Ms. Hannigan entered her appearance on my case December 12, 2011 and would visit me for hours venting about her personal life. Ms. Hannigan stated she was in her 50's and don't have any kids are a boyfriend. and how she haven't had sex in years ~~do~~ because she can't find a Man to trust. Ms. Hannigan also stated she lived with her mother that has alzheimer she takes care of. she said her sister don't help take care ~~they~~ mother. so she works parttime as a appeal Attorney in belleville, IL. Ms. Hannigan stated she got suspended in Chicago, IL for Forgery of documents of a Doctor signature by the ARDC. ~~this~~ This no legal argument there was no ~~any~~ work done in my cases. ~~was~~ Mr. Stegmeyer was suspended I was over charged on Fees. Ms. Hannigan committed ~~to~~ Fraud and I was defraud and misrepresent Mr. Stegmeyer didn't work for My Fees.

/ End of Statement of Claim

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*Do too defendant taking my funds for his personal use and leaving me no funds*  
 I am requesting the sum of \$150,000.00 cash in ~~damages~~ damages, punitive money damages as well and that both defendants be fully investigated by the ARDC for common ~~to~~ scheme they engaged in at the Madison County Jail.

#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7-28, 2016

Signature of Plaintiff

Demetrius D. Moore

Printed Name of Plaintiff

Demetrius D. Moore

##### B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

Relief

~~the reasons~~

I Feel I am entitled to actual or ~~propose~~ punitive money damages, because I have to pay Social Security back over \$5,000.00 and Mr. Stegmeier didn't earn my fees. he was suspended 60 days and was being ~~paid~~ paid. I loss my grandmother and need My money to pay Social Security back and ~~to~~ buy my grandmother a head stone, and all the stress Mr. Stegmeier put me through, him and Mr. Hannigan I now see a Mental doctor here a pinchneyville C.C.